

Cynthia Kitchens v. The Boeing Company
Case No. 2:16-cv-03723-RMG-MGB

DEFENDANT THE BOEING COMPANY'S MOTION FOR SUMMARY JUDGMENT AND SUPPORTING
MEMORANDUM

EXHIBIT “A”

EXCERPTS FROM THE DEPOSITION OF CYNTHIA KITCHENS

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

CYNTHIA KITCHENS,

Plaintiff,

vs. CASE NO. 2:16-CV-03723-RMG-MGB

THE BOEING COMPANY,

Defendant.

DEPOSITION OF: CYNTHIA KITCHENS

DATE: FEBRUARY 23, 2017

TIME: 10:15 AM

LOCATION: NEXSEN PRUET, LLC
205 King Street, Suite 400
Charleston, SC

TAKEN BY: Counsel for the Defendant

REPORTED BY: Laura J. Bash,
Registered Merit Reporter

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1 And we were at our desks, I was sitting
2 here, he was sitting next to me, talking to me; we
3 walked down and you go to the end, and there is
4 Gordon's desk. So about a week or so later, I
5 walked by Gordon's desk and he was talking to
6 Gordon, Mike was. And he said, Cindy, walk with me
7 a minute. And I said, okay. So we walked back up
8 towards my desk; and he said, did you ever have
9 chemo? And I said, well, yeah, you know, I had
10 chemo in my treatment. He said, do you know what
11 chemo fog is? And I said, yeah, but it's not like
12 Alzheimer's, it doesn't stay with you. And he
13 said, well, you think it's that or your age? And I
14 said, I don't know.

15 And so we walked on up to the stairs
16 back towards my desk. We were at top level there
17 by my desk, and I -- I said, if that's what they
18 truly think, then I'm screwed. And the reason I
19 asked him was because I said, I'm being blackballed
20 for something. If it's something in my job that I
21 can improve, I will be glad to improve it.

22 But when he told me what -- I don't
23 know if he went to the seniors. I don't know if it
24 was his opinion. Alls I know is that's what he
25 told me. And I thought at that point, I can't fix



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1 that. If that's their true belief, I can't fix
2 that.

3 Q. Did this conversation that you've just
4 described with Mike Tidmore, do you remember what
5 year that occurred?

6 A. It was -- I think it was like in
7 April 2015. Because he was covering for one of my
8 senior managers at the time. I'd had Mike before
9 as a senior manager, and I knew he was a good
10 manager. And -- and I knew he would be honest with
11 me if I asked him to find out what was going on.

12 Q. And did you report what Mike told you
13 to anyone at Boeing's EEO department?

14 A. No. I don't think I did for that. I
15 went to the other managers, because you're allowed
16 to do that when you have -- you know, amongst your
17 peers to -- I said, you know, what can I do to fix
18 this?

19 Q. Okay.

20 A. You know, I felt like I had talked to
21 Gordon about it. I talked to Dallas Ratliff. I
22 talked to Bill Hobek. And I actual talked to my
23 leadership coach about it, my executive leadership
24 coach that I had, Jennifer -- I can't think of her
25 last name, S-K-P --



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1 THE WITNESS: Do you remember her last
2 name, Bonnie?

3 BY MS. CHERRY:

4 Q. Ms. Kitchens, you're not permitted to
5 talk to your attorney while you're under oath about
6 your lawsuit. Okay?

7 A. Oh, okay.

8 Q. And that includes not just when we're
9 here in the room, but when we take a break.
10 Because you are under oath, you cannot discuss your
11 testimony. And if you don't remember something,
12 it's okay for you to tell me you don't remember.
13 She can't help you with your testimony. Okay?

14 A. Okay. But I have it in an e-mail that
15 I gave to her, so I can get it to you if you need
16 it.

17 Q. Okay.

18 A. Okay.

19 Q. And so tell me, as I understand it,
20 your conversation with Mr. Tidmore was asking why
21 you were still in Cell 10; is that correct?

22 A. Why I was put back in there, yes.
23 Because before I went out for my cancer treatment,
24 I was asked to be the process monitor manager over
25 the whole site and I had like four or five



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1 employees in each building. And then when I came
2 back was when I found the mistake that I told you
3 about, the large mistake.

4 And then I was put on day shift. Keith
5 Castleberry asked me to go on day shift for a
6 little while, but never said why I was going on day
7 shift. And I was on there like three weeks, and
8 then they asked if I would go back on second shift.
9 And I went back on second, and that's when Mike was
10 like the manager.

11 And that was -- well, that was after I
12 had come back. I'd been back a while before that
13 happened. Because I went out with cancer in 2013.

14 Q. Okay. And I'm just trying to
15 understand, Ms. Kitchens, and I'm not quite
16 following. You were asked to be on second shift
17 and --

18 A. And then I went on -- I'd go -- I
19 always went on any shift they asked me to.

20 Q. Okay.

21 A. So I went on second shift, back in
22 Cell 10. And then that's where I stayed, and it
23 was like I couldn't get off -- out of that cell.
24 And you know, I tried to get different jobs. I
25 tried to apply for flight line because my -- you



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1 know, my credentials and things are more for flight
2 line and the 145. Which is once an aircraft is
3 certificated, it's under 145 repair station.

4 Q. Okay. So and that's what I'm trying to
5 understand when you talk about getting out of
6 Cell 10. It's other positions --

7 A. Right.

8 Q. -- that you applied for?

9 A. Correct.

10 Q. And so it's your testimony -- this is
11 what I'm trying to understand -- that Mr. Tidmore
12 told you you were not getting the other positions
13 that you applied for either because of chemo fog or
14 age; is that correct?

15 A. Yes. And I had asked him, could you
16 please check and see why I'm stuck in Cell 10?

17 Q. Okay.

18 A. Because if it's a problem of something
19 I need to improve, I was willing to go get the
20 schooling or whatever they needed for me to -- to
21 move on into another position. I have all kinds of
22 certificates and licenses and stuff.

23 Q. Sure.

24 A. I didn't know what more they needed.
25 So I found out we had that leadership coach, and I



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1 I forgot my one grandchild's name. Because I knew
2 this picture, but I didn't know who he was. So
3 there is such a thing as chemo fog.

4 Q. Sure.

5 A. And then when I said, well, I don't
6 know, I did forget my -- my grandchild's name. But
7 then he -- he just said, well, you think it's that
8 or your age? So, you know, that's exactly what he
9 said to me. So I felt that he must have went and
10 asked. I mean, I just assumed he went and asked
11 and didn't just take that on himself, but I
12 wouldn't know.

13 I mean, if he's under oath and he has
14 to sit up there, he can tell you the same thing.

15 Q. And so you -- you don't know who
16 Mr. Tidmore spoke to --

17 A. Spoke to?

18 Q. -- or even if he did?

19 A. No, I don't know that.

20 Q. Okay. And was Mr. Tidmore the hiring
21 decision maker for any positions that you had
22 applied for?

23 A. He was my senior manager at that time,
24 so that's who you go to to ask those questions.

25 Q. Sure.



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1 And, Ms. Kitchens, that's not what I
2 asked.

3 A. Okay.

4 Q. Was he the hiring manager for any of
5 these positions that --

6 A. No.

7 Q. -- you applied for?

8 A. You don't know who the hiring manager
9 is when you apply for them, so I wouldn't know at
10 that time if he was the hiring manager for any of
11 them.

12 Q. Okay. I tell you what, Ms. Kitchens,
13 I'm going to come back and ask you about -- a
14 little more about this conversation.

15 A. Uh-huh.

16 Q. But I -- I want to cover a few other
17 things, then we'll come back to that.

18 A. Okay.

19 Q. How long have you -- as I understand
20 it, you live in Florida currently?

21 A. Uh-huh.

22 Q. Okay. How long have you lived in
23 Florida?

24 A. I moved down there October 14th.

25 Q. Okay. And prior to October 14th of



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1 the time.

2 Q. Okay. And do you -- and I'm going to
3 ask you a little more. I understand that you
4 resigned your employment --

5 A. That's correct.

6 Q. -- but, Ms. Kitchens, did your
7 resignation of employment have anything to do with
8 having made some reports in 2011?

9 A. No. That was back in 2011. I worked
10 there all the way up until this last year.

11 Q. Okay.

12 A. The harassment and retaliation and
13 intimidation factors of that company were just
14 unbearable, and I just couldn't do it anymore.

15 Q. We were talking about, Ms. Kitchens,
16 your use of different policies or procedures at
17 Boeing in terms of making complaints, that you've
18 used Boeing's ethics, used it in 2011. You used it
19 again in 2014.

20 A. Uh-huh.

21 Q. And I understand that you're aware of
22 Boeing's code of conduct policy and requirements.

23 A. Uh-huh.

24 Q. And I wanted to hand you what I'm going
25 to mark as Exhibit 17, an instance where I believe



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1 So that year, Steve Parrinello got the
2 highest score that he'd ever got because he got my
3 scores. So -- and then the next one they did, they
4 changed managers, which I changed with Gordon and
5 Gordon got a high score because he got my scores.
6 Because he -- he came over and thanked me. Thank
7 you, Cynthia, I got really high scores because I
8 got your scores.

9 (DFT. EXH. 32, 7/15/2014, Boeing
10 Performance Management document, 4/1/2014 -
11 12/31/14, was marked for identification.)
12 BY MS. CHERRY:

13 Q. I'm going to hand you what I have
14 marked as Exhibit 32, Ms. Kitchens. And this is
15 the PM for 2014, the interim PM for 2014. So this
16 was the first PM after the 2013 final year-end PM.
17 Okay?

18 A. Okay.

19 Q. Flip to the last page. And if you
20 look, so Stephen Parrinello is the one who signs
21 this in July, correct?

22 A. Correct, uh-huh.

23 Q. Okay. And it looks like he -- his
24 leadership attribute score for you was a 16. Did
25 you disagree with that score?

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1 A. On one of them for one of the things
2 for a find a way or for -- the one he gave me a 2
3 on, he said, you don't reward your employees. And
4 I said, well, yes, I do. Because you get a bag of
5 tokens and all these certificates, like 25 of them.
6 And I gave them out every month. I didn't give
7 them just to my people. I gave them to the trash
8 guys, the ladies who cleaned the restroom, anybody
9 that was working hard, mechanics, I gave out
10 everything.

11 And he said, oh, well, you didn't
12 record it. And I'm like, where are you supposed to
13 record it at? Well, they put something online that
14 you were supposed to go in and write everybody's
15 name you gave it to and why you gave it to them.
16 And I said, if I'm giving out certificates just to
17 get a better PM for myself, then I'm not giving the
18 certificates for what they are meant for. They are
19 meant for doing a good job or for improvement.

20 So I said, I'm not -- you know, I said,
21 let's go over to the department where they turn
22 them in and you can count my name on all the
23 certificates and see that I have done it. And he
24 goes, oh, no, don't worry about it, we'll do it
25 next time. So I just stayed with the 2, because I

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1 was like -- and a couple times, I thought, I need
2 to go over there and just get how many they have so
3 that I could raise that up from a 2.

4 But I thought, I've got -- I've got
5 work to do. And that's why I always said when it
6 came to my PM, I would just let it go to make sure
7 I maintained the work on the floor in the aircraft.
8 But I was surprised he gave me a 16 on that one.

9 Q. And why were you surprised with a 16?

10 A. Because he wanted to do like a 1 or --
11 in a couple areas, and I talked him up to the 3s
12 and the 2s. So, you know --

13 Q. So the score was better than you
14 thought he was going to give you?

15 A. Yeah. I actually had brung
16 documentation that time with me. I brought a
17 folder and said, okay, Steve -- and I actually
18 presented -- he had put me in a 1 or a 2 for one of
19 these. And I said, Steve, really, how can that be
20 when I scored 100 percent? And he looked at me --
21 because then I had the documentation. He goes, oh,
22 okay, and he changed it. So it was good to start
23 keeping this kind of stuff because, then, at least
24 I had something to take to my PM to bring it up to
25 my score.

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1 Q. Okay.

2 A. And that's -- actually, these documents
3 are actually what I used also with ADR to bring up
4 the scores that they had given me. Because there
5 was like three or four where he contradicted
6 himself, and it was shown I had scored 100. So he
7 had to change it.

8 Q. Okay. So having the documentation
9 actually resulted in --

10 A. Brought my -- brought my score back up.

11 Q. Yes. Okay.

12 I'm going to hand what you what we'll
13 mark as Exhibit 33, Ms. Kitchens.

14 (DFT. EXH. 33, 12/23/2014, Boeing
15 Performance Management document, 4/1/2014 -
16 12/31/2014, was marked for identification.)

17 BY MS. CHERRY:

18 Q. If you look, this is your year-end PM
19 for 2014. It looks like Mr. Parrinello has signed
20 this again.

21 A. This is right before the Christmas
22 holiday.

23 Q. Okay. And what's your leadership
24 attribute score then?

25 A. It was 15.

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1 ethics and told them somebody needs to get down
2 there and figure out what's going on.

3 Q. And I'm going to ask you about that in
4 a minute.

5 A. Uh-huh.

6 Q. But let me ask you about your next PM.

7 A. Okay.

8 (DFT. EXH. 36, Boeing Performance
9 Management document, 1/1/2015 - 12/31/2015, was
10 marked for identification.)

11 BY MS. CHERRY:

12 Q. I'm going to hand you what I have
13 marked as Exhibit 36. And this is your interim PM
14 from 2015. So this, if you turn to the last page,
15 it's dated June 30th of 2015 and signed by
16 Mr. Parrinello. Do you see that?

17 A. Yes.

18 Q. So this PM would have come after your
19 communication with Ms. Wyse in April of 2015,
20 correct?

21 A. Correct.

22 Q. And if you look --

23 A. And then I have a question.

24 Q. Sure.

25 A. Where is the one that he raised back up

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1 to a 17? Because I haven't seen that.

2 Q. That -- we went over the ADR form for
3 the raising of your score on that one.

4 A. Oh, it didn't show it on the paper?
5 Because it said --

6 Q. I just didn't print that one.

7 A. Okay.

8 Q. So the -- this one is after your
9 meeting with Ms. Wyse.

10 A. Okay.

11 Q. If you look at your leadership
12 attribute score, it's a 16, correct?

13 A. Correct.

14 Q. Okay. And Mr. Parrinello gave this to
15 you in June of 2015, right?

16 A. Correct.

17 Q. And if you look in your employee
18 comment section, there's a statement that says:
19 Need to start sending e-mails to record things that
20 I do. And then: Because of lack of my written
21 communication, I received two at lower than I would
22 have if I had sent e-mail to let seniors know.

23 Do you see that?

24 A. Uh-huh.

25 Q. Is that what you were telling me about

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1 (DFT. EXH. 39, 12/1/205, E-mail chain,
2 was marked for identification.)

3 BY MS. CHERRY:

4 Q. Okay. I'm going to hand you,
5 Ms. Kitchens, an e-mail chain that you produced
6 with LePrincess Porter.

7 A. Uh-huh.

8 Q. Who is Ms. Porter?

9 A. HR.

10 Q. Boeing's HR?

11 A. HR for the 20 Building for quality.

12 Q. Okay. So she was your point of contact
13 for HR?

14 A. Yes.

15 Q. Okay. And tell me what -- the subject
16 lines, it has to do with trash left on desks. Tell
17 me what's going on here.

18 A. Okay. So I had a temp manager who
19 was -- she was put into a temp manager's position,
20 and she started -- I don't know why -- well, I take
21 it back. We had an audit. And I was auditing the
22 tool cage which had my name on it.

23 Q. Okay.

24 A. And she said, there's nothing wrong
25 with the cage, it was totally fine. Well, I

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1 audited the tool cage and I had three pages of what
2 wasn't fine with it. It had tools in there from
3 the other building. That was part of our PC700, so
4 it's a big deal.

5 And the big deal is it had my name on
6 it, not hers. So she felt like I was attacking her
7 because she had sent the e-mails to the seniors.
8 You know, she's a temp manager. So she wanted to
9 try to do a good job, and I get that. But she
10 thought that that was an attack against her.

11 And then, you know, we'd send stuff,
12 like she would let jobs go on down line instead of
13 completing them. And we did a turnover in our --
14 turnover, and we'd send her the document of where.
15 You know, she let it go on down line, which means
16 they have to remove a lot of stuff to get to that
17 point to fix it. So it caused a lot more work and
18 everything.

19 So then she started coming to my desk
20 and attacking me. She brought this woman to the
21 desk that was in safety and said, we can get on the
22 ladder, I don't know why you can't get on the
23 ladder. And she sent me an e-mail -- I work third
24 shift, so I don't come in till 11:00. She sent it
25 when she went home, after first shift, and said,

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1 we're having a meeting in the morning. Well, a
2 meeting in the morning, I already had a manager's
3 meeting that was mandatory. I couldn't meet it.

4 But I can't answer her because I'm on
5 third shift, and she's coming in at 6:00, thinking
6 I'm going to be there for the meeting. So when I
7 wrote an e-mail that I wouldn't be at the meeting
8 because I had this other meeting, so she comes to
9 my desk and she starts screaming at me in front of
10 everybody. You're not a team player, you're not a
11 team player. You know, you need to do this.

12 And I'm like, I'm -- I'm late for this
13 other meeting, I have to go. I said, I took care
14 of it in my meeting with my employees last night.
15 We made sure, you know, everybody could get to it.
16 Everybody is getting training for the machine to
17 get up there so they don't have to use the ladder.
18 She goes and takes a picture of herself on the
19 ladder so that she could show she could see on top
20 of the plane with the ladder.

21 It was just nonsense, things like that
22 all the way up. So I cleaned the department every
23 night when I'm there. So I went over, and there
24 was a bag of trash they found on a plane. FOD,
25 they call it. And they use it at the boardwalk in

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1 the morning.

2 So I put it on her desk so she could
3 take it to the boardwalk in the morning. And then
4 there was a soda bottle. They had a party. So I
5 put that on her desk. So she takes a picture in
6 the morning and sent it to my manager that's --
7 she's putting trash all over my desk. And, you
8 know, my manager sends back, that's totally
9 unacceptable, Cindy -- without even asking me why
10 did I put it there.

11 I'm not going to throw your soda away
12 because I don't want you to be upset. And you need
13 the FOD, so I'm not going to throw that way. I
14 don't know what the big deal was.

15 So I knew at that point -- and -- and I
16 had already spoke to Steve about it in our meeting.
17 And I sat down -- I came in early one night at
18 5:00, I didn't work till 11:00 and I said, look,
19 Steve, I said, she's harassing the crap out of me.
20 You need -- he goes, do you want me to talk to her?
21 I said, I just want her to like stay away from me
22 or, you know, I'm going to have to move to another
23 area.

24 Because I have issues with -- because
25 of my cancer, that when I'm under stress, I just go

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1 to the bathroom. I can't get up and leave. It's
2 just happening.

3 Q. So Ms. Tracy Darnell, was she --

4 A. Yes.

5 Q. Was she --

6 A. It was Tracy Cleveland.

7 Q. I mean, Tracy Cleveland.

8 A. No. It's Darnell now. It was Tracy
9 Cleveland. She got married.

10 Q. So Tracy Cleveland was a female manager
11 on a different shift?

12 A. She was on first shift.

13 Q. On first shift?

14 A. Yeah.

15 Q. And so when you say "she," I just want
16 to make sure that the record is clear --

17 A. For the name, yes.

18 Q. -- that's it's Tracy Cleveland.

19 A. Right.

20 Q. So it's a -- she's the same level
21 manager as you?

22 A. She was a temp manager.

23 Q. Okay. But I realize temp, but same
24 level?

25 A. Yes.

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1 Q. Okay. So same level manager as you --

2 A. Right.

3 Q. -- but temporary, on a different shift?

4 A. Right.

5 Q. And there was tension for the reasons
6 that you've explained to me, some of the issues
7 going on?

8 A. Correct.

9 Q. And that became stressful for you?

10 A. Yes.

11 Q. Okay. And I understand this e-mail, it
12 looks like, that you sent to LePrincess, who was
13 the HRG for you -- or for your area.

14 A. Right.

15 Q. And you're asking her to -- you say: I
16 need this to be recorded.

17 A. Well, and I -- I said to Steve, you
18 know, I'm serious, you need to move me out of this
19 situation because -- I mean, it was starting to
20 really cause issues with -- you know, with my
21 cancer treatment. And I was in recovery -- I'm
22 still in recovery, because it's five years after
23 you have cancer it can come back in that five-year
24 span and you have to continue to doctor and stuff.

25 So stress is like the number one thing.

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1 So I told him, please, just move me. I didn't say
2 move her. I said, move me, just put me somewhere
3 else and, you know, we'll talk about it. And then
4 I sent it to HR to let her know that, you know, it
5 needed -- it was serious and it needed to be taken
6 care of or I was going to have to -- you know, I'm
7 going to have to go somewhere else.

8 And that's when I said to EEO -- I
9 meant EEOC. I see it's not written out right.

10 Q. Okay.

11 A. But you know, and then Steve came back
12 to me and said, no, we're not going to do that.
13 And that's when the trash issue came out. And I
14 said, look, I need to have a meeting. And he sent
15 a thing and said, we'll have a meeting and then
16 we'll -- we'll fix it or something.

17 And I said, I've already asked for a
18 meeting. Let's have a meeting with HR and her
19 and -- and go over it, and her manager. So they
20 called the meeting. And I said, let's sign my PM.
21 And he was like, no, no, let's wait. Because my PM
22 was ready the week before, and he wouldn't let me
23 sign it.

24 So we went to HR. It was Tracy,
25 LePrincess, myself, Steve, and Sue. Because Sue



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1 was -- what was her name? Heitkamp is -- was her
2 manager at the time. And so, you know, we
3 discussed a few things in there. We didn't discuss
4 everything that had led up to that.

5 So they said, okay, we're going to give
6 you each a verbal corrective action. And I'm
7 sitting there stunned because I'm a manager and
8 she's a temp. HR should have took her manager and
9 her in another room, because that's the process,
10 and gave them what was going to happen. And I
11 should have received mine. And I'm thinking, okay,
12 okay, we're both in here, I'm going to let this go.

13 So then I come in, and there's an
14 e-mail that's sent out in an e-mail form that
15 Cynthia Kitchens received a verbal corrective
16 action and Tracy -- and I'm thinking, what is this?
17 So I went back to LePrincess and said, this is not
18 like per your process, this isn't even supposed to
19 happen. And she said, well, no, you're wrong. She
20 goes, she was just recording the minutes. And I go
21 who records minutes of a write-up meeting, you
22 know? It was just like insane.

23 So that -- as soon as we left that
24 meeting, they actually moved her to the other end
25 of the building. Because at that point, they knew

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1 that, you know, I said I'm going to report this if
2 you don't do something. So they moved her to the
3 other end of the building, and she worked down
4 there. So I didn't have to like have her in the
5 same department and deal with it and stuff.

6 And the thing was, she was a temp
7 manager. I was helping her in the beginning,
8 mentor her and everything. And then all of a
9 sudden, she just went -- when -- with the tool
10 cage, she just -- I don't know what happened to
11 her.

12 And actually, I'm the one that got her
13 and Chereld Thorne their temp managers' positions.
14 Because when Miranda Wright came -- or Miranda
15 Jennings came in as a senior, I said, would you
16 please look at these two ladies, they've been
17 overlooked, they're both black women, they've been
18 overlooked through their career. These other guys
19 are -- been in their class and they're senior
20 managers.

21 And so she made them both temp managers
22 to give them the chance to see what they could do.
23 So...

24 Q. So do you remember when Ms. Cleveland
25 was moved? You said she was moved?



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1 A. The day -- the day I had the meeting
2 with HR, that morning, they moved her to the other
3 end of the building. And that was the -- they
4 would have had it recorded for me as getting the
5 verbal corrective.

6 Q. Okay. And as I understand it, you both
7 did?

8 A. Yes.

9 (DFT. EXH. 40, E-mail chain, was marked
10 for identification.)

11 BY MS. CHERRY:

12 Q. Okay. And I'm going to hand you
13 Exhibit 40, Ms. Kitchens, and just ask -- this is a
14 group of e-mails between you and Steve Parrinello
15 and LePrincess Porter regarding --

16 A. This was about the trash thing.

17 Q. Okay.

18 A. Yeah, that's -- that's the trash thing.
19 That's when I got to the point where I said, look,
20 you're going to have to move me or move her, you
21 know. It's...

22 Q. Okay. And did you -- if you look at
23 the front page of this, on December 9th, LePrincess
24 asks you to provide your statement. Did you
25 provide LePrincess with a statement?

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1 A. Because whenever I said I got 900, and
2 he looked at me, he goes, why, you worked for my
3 department for me? And I said, I don't know why.

4 Q. Okay.

5 A. Now the one for the 600, that's when I
6 thought, okay -- that was this past time. And I
7 said, okay, I'm turning this in. And then that's
8 when I turned it in and...

9 Q. Okay. So as I understand it, I've
10 handed you this last exhibit that we marked -- what
11 exhibit number is that?

12 MS. HUNT: 42.

13 BY MS. CHERRY:

14 Q. -- 42, that you filed for the internal
15 ADR process over the raise issue.

16 A. Yes.

17 Q. And as I understand it, Boeing's
18 internal ADR department turned it over to Boeing's
19 internal EEO department to investigate, correct?

20 A. Correct.

21 (DFT. EXH. 43, Boeing, TBC/CK_000443
22 through TBC/CK_000444, was marked for
23 identification.)

24 BY MS. CHERRY:

25 Q. Now I'm going to hand you what I've

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1 marked as Exhibit 43 and ask if you recognize this
2 as Boeing's EEO investigation.

3 A. Yes. Because I told them that, you
4 know, they needed to check and -- and see why the
5 paper said 600, I got. And then that's when he
6 came back and said that they had adjusted -- they
7 adjusted my -- I guess, where you're supposed to be
8 for what your job scope is. And that was the
9 difference in the \$600. So I said, well, if that's
10 what it was, then I don't have an issue with it.
11 But that was this past year. That was not the one
12 that Gordon got \$2,000 more than me.

13 Q. But this actually doesn't say that it
14 was adjusted. It just says that your work history
15 reflects that you actually received an \$1,800
16 salary increase.

17 A. And that's what it says. But when he
18 talked to me on the phone, he said it was an
19 adjustment that was done. Because I said, you need
20 to find out why my paper says 600 and your --
21 you've got 18 something.

22 Q. Yeah. Do you get pay stubs?

23 A. It's direct deposit.

24 Q. Okay. Do you get documentation of the
25 direct deposit?

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1 Ron weren't involved with other buildings.

2 A. No.

3 Q. Okay. So after you were under Rocky's
4 supervision for a month or so when you came
5 back --

6 A. Yes.

7 Q. -- you then got moved under Ron Pentz?

8 A. Correct.

9 Q. Okay. Do you know how long Rocky
10 Haskell had been working on covering second and
11 third shift?

12 A. I don't know when Steve Parrinello was
13 moved, like when I was out sick between January and
14 March. But I knew as soon as he was moved to the
15 other building, which I think was the end of
16 January, I can't -- I don't know for sure, somebody
17 had just told me, so Rocky took over that, when he
18 was moved over to final assembly.

19 Q. Okay.

20 A. So I believe it was like the end of
21 January, but I didn't come back until March.

22 Q. In March. Okay.

23 So as I understand your testimony, you
24 believe that you, on third shift, were moved from
25 Rocky Haskell to Ron Pentz because Ron Pentz wanted

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1 to put you on a PIP?

2 A. Correct. And the reason I know that is
3 because -- so -- and this is what made me so
4 nervous, was two -- Bill -- when Bill showed Keith
5 Castleberry what he had and was going to ethics,
6 within two weeks, he was moved in the 19 Building.
7 Like, that week. And then within two weeks, they
8 gave him Ron, and Ron put him on a PIP and then
9 walked him out.

10 So when they put me under Ron, there
11 was no reason for me to be switched to another
12 manager. So two weeks -- two weeks to the day
13 after he had me, he's going to put me on a PIP.
14 And then I know what comes next. You're going to
15 walk -- and I said to him when he was meeting with
16 me that day, I said, you're putting me on a PIP so
17 you can walk me out. He goes, is that what you
18 believe? And I said, yes.

19 Because even my leadership coach told
20 me that the reason -- I said, why don't they just
21 say that they want to get rid of you, it's time to
22 go? Why do they have to humiliate you and put you
23 on a PIP and walk you out when you've been a good
24 employee? And she said, that's their legal
25 document for you being let go. They have to have

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1 that document. That PIP has to be recorded so that
2 they can show that you didn't do your job and you
3 are gone.

4 So, you know, I have too good of an
5 aviation career to be let go from Boeing after
6 seven years of working hard, to let that happen.
7 And I just got to the point where I was like so
8 stressed out and couldn't deal with it that night.
9 And I just said, this is it, I'm done. Because at
10 that time, I was physically sick and couldn't even
11 come to work anyway.

12 Q. Do you know what PIP stands for,
13 Ms. Kitchens?

14 A. It's a performance improvement plan.

15 Q. Okay.

16 A. But I know, just like the PMS, they're
17 used in retaliation. They are not used for what
18 they really would be used for. Because Teri
19 Roumillat who got -- I had to put her on a PIP
20 because she was 15 certs behind, I helped her get
21 her certs back and worked with her and made sure
22 that she did not get fired. I didn't feel with Ron
23 that I had that same opportunity.

24 If Victor -- Rocky would have done that
25 to me, I would have worked it. Because I know he



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1 A. I don't know who she worked with.

2 Q. Was she working with Stephen (sic)?

3 A. She had all the buildings, so I don't
4 know who she had.

5 Q. Did she work with Bill Hobek?

6 A. I don't know.

7 Q. Do you know if she worked with any
8 other employee at Boeing who was on a PIP?

9 A. No, I don't know that. You're not
10 really supposed to know who is on a PIP. It's like
11 a secret.

12 Q. Okay. So if -- as I understand it, you
13 said Rocky Haskell reported to Neil Wright as well?

14 A. Yes.

15 (DFT. EXH. 44, E-mail, TBC/CK_000701,
16 was marked for identification.)

17 BY MS. CHERRY:

18 Q. I'm going to hand you what I have
19 marked as Exhibit 44. Ms. Kitchens, this is an
20 e-mail from you to Ron Pentz on June 1st.

21 A. Uh-huh. Right.

22 Q. And the subject says: Approve again.
23 This is referencing some vacation days that you've
24 requested?

25 A. Right.



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1 Q. And it looks like you were requesting
2 June 16th?

3 A. Uh-huh.

4 Q. June 19th and 20th; is that correct?

5 A. Correct. Uh-huh. It already had been
6 approved by Steve, so I just wanted to make sure
7 Ronnie was aware of it.

8 Q. Okay. And there was a reference about
9 booking a cruise for your grandson?

10 A. Yes.

11 Q. Did you go on that cruise?

12 A. Yes, I did.

13 Q. Now let's see. That e-mail was sent on
14 June 1st at 1:42 a.m.

15 (DFT. EXH. 45, E-mail, TBC/CK_000746,
16 was marked for identification.)

17 BY MS. CHERRY:

18 Q. I'm going to hand you what I have
19 marked as Exhibit 45. Here's an e-mail from you to
20 LePrincess Porter that same day, but it was about
21 an hour and a half earlier.

22 A. Uh-huh.

23 Q. You're asking LePrincess if she's met
24 with Ron yet?

25 A. Yeah. They were supposed to talk about

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1 a little bit, Ms. Kitchens.

2 A. Uh-huh.

3 Q. And I can appreciate that you don't
4 remember exact dates.

5 A. Uh-huh.

6 Q. But you've e-mailed Ron a few times in
7 early June. We have seen those e-mails, telling
8 him I've got vacation lined up, I'm going to be
9 late, or I'm out sick, or whatnot at the beginning
10 of June.

11 A. Uh-huh.

12 Q. And I see no indication or reference
13 anywhere to a PIP or anything like that.

14 Then I see an e-mail from you to Ron
15 saying you're going to be out on a leave of absence
16 starting on June 13th.

17 A. Uh-huh.

18 Q. So prior to June 13th, had Mr. Pentz
19 put you on a PIP?

20 A. No.

21 Q. Prior to June 13th, had he told you he
22 was going to put you on a PIP?

23 A. Yes.

24 Q. Now, as I understand it, you're out.
25 You are not physically at work between June 13th



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1 and June 27th, correct?

2 A. Correct.

3 Q. Okay. So Mr. Pentz can't give you a
4 PIP then, correct?

5 A. Correct.

6 Q. And you either came back on the 28th or
7 the 29th, correct?

8 A. Uh-huh. Correct. It was a Monday.

9 Q. Okay. And as I understand it, you have
10 sent your e-mail to Ellen Martin on June 29th.
11 That's the date of this e-mail, correct?

12 A. Okay.

13 Q. So this is after you returned from your
14 leave.

15 A. Yes. That was when he told me that he
16 was putting me on the PIP. That's why I went back
17 to my -- on the 28th, that's why I went back to my
18 desk and wrote this letter to the head.

19 Q. Okay. Now I actually thought that you
20 told me, you just testified -- and I can get the
21 court reporter to read it back -- that Mr. Pentz
22 told you that he -- before you left on June 13th
23 that he was going to put you on a PIP.

24 A. He did. He told me two or three times
25 that he was going to put me on a PIP.



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1 Q. Okay.

2 A. He told me when we did the review with
3 that development page, that he was going to put me
4 on it. Senior Manager Kelly was in the office.
5 And he told me when he had me stay over that
6 morning that he was going to put me on the PIP.

7 Q. Okay. So you're out for two weeks, and
8 then you return.

9 A. Correct.

10 Q. And when you return, he approaches you
11 again about the PIP?

12 A. Uh-huh.

13 Q. Okay. Did Mr. Pentz ever sit down and
14 give you the PIP?

15 A. No.

16 Q. Okay.

17 A. That's why I felt like it was a
18 intimidation. It was like threatening. He was
19 threatening me with it, but he wasn't actually
20 doing it.

21 Q. Then you sent your e-mail to
22 Ms. Martin, correct?

23 A. Yes.

24 Q. On the 29th?

25 A. Uh-huh.

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1 Q. Okay. And as I understand it, the very
2 next day, you tendered your resignation?

3 A. Correct.

4 (DFT. EXH. 49, 6/30/2016, Kitchens
5 handwritten note, TBC/CK_00028, was marked for
6 identification.)

7 BY MS. CHERRY:

8 Q. I'm going to hand you what I've marked
9 as Exhibit 49. Is that your resignation letter?

10 A. Uh-huh. Plus, I sent it in a e -- I
11 sent it in a text form, too, to LePrincess, Ron,
12 and Victor.

13 (DFT. EXH. 50, E-mail, TBC/CK_000447,
14 was marked for identification.)

15 BY MS. CHERRY:

16 Q. I'm going to hand you Exhibit 50.

17 A. And I also had a handwritten of what I
18 was turning in at the -- at the welcome center to
19 the security guard, of what things -- items I was
20 giving him, and he signed it for me.

21 Q. And in the handwritten resignation
22 letter that we marked as Exhibit 49, is that the
23 letter you left at the welcome center?

24 A. Yes. With the key to the desk where
25 the computer was.

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1 A. Correct.

2 Q. The first one you have listed is
3 supplier quality in April of 2015.

4 A. Yes.

5 Q. Okay. What --

6 A. When she asked, I didn't have -- I knew
7 I applied for different jobs. I didn't have exact
8 dates and all that stuff because it was done
9 through the Boeing computer, through -- for
10 Boeing.com.

11 Q. Okay.

12 A. And everything should be recorded on
13 there for dates and times and -- of the ones I
14 applied for. I applied for a lot of positions.

15 Q. Okay. Well, let me ask you about the
16 ones you have identified first.

17 A. Uh-huh.

18 Q. So the supplier quality, was that a
19 manager position?

20 A. Yeah. Yes, it was a manager's position
21 in the supplier quality.

22 Q. And was it a K-level manager's
23 position?

24 A. Yes.

25 Q. Okay. Do you know how many people

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1 applied for that position?

2 A. No. But I know the guy who got it, and
3 he was qualified.

4 Q. He was qualified?

5 A. I asked, and he was qualified.

6 Q. Okay. And what was his name?

7 A. Steve -- I don't know the last name
8 now, but when they -- or Greg? Was it Greg?
9 Sorry. When they told me, I said, oh, okay, I
10 totally understand why he got it. I agreed.

11 Q. Okay.

12 A. I don't mind losing a job to somebody
13 who has the qualifications. I just don't like when
14 I know the ones that went out on flight line have
15 less background than me and they got the job.

16 Q. Well, I'll ask you about flight line.
17 You have got that one, third.

18 A. Uh-huh. Right.

19 Q. But the next one, you have quality
20 manager, K-level. Do you know how many people
21 applied for that position?

22 A. No.

23 Q. Do you know who was hired in that
24 position?

25 A. No.



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1 Q. So do you have any information about
2 the qualifications of the person who --

3 A. Are you talking about the flight line
4 one?

5 Q. I'm talking about the second one you
6 have listed in your charge --

7 A. Quality manager, K-level, July?

8 Q. Yes.

9 A. Okay.

10 Q. Do you know who was selected for that
11 position?

12 A. It was somebody over in -- it was for
13 final assembly. And Steve just said some guy got
14 it over there because he decided to take that
15 instead of the flight line one.

16 Q. Okay. Do you know anything -- do you
17 know the name of the individual who got that
18 position?

19 A. No.

20 Q. Do you know the qualifications of the
21 person who got that position?

22 A. No, I don't.

23 Q. Do you know whether you are more
24 qualified than the person who got the position?

25 A. No. Because I didn't know at the time



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1 we were allowed to ask those questions, after you
2 applied for a job, that they have to let you know
3 who received it and what their qualifications were
4 above yours. Not what all their qualifications
5 were, but what you needed that they had.

6 Q. Okay.

7 A. So I didn't know until after I filed
8 this that I was -- she told me at the EEOC office
9 that I was able to ask those questions. Didn't
10 know that before.

11 Q. Sure.

12 So have you come to know -- do you know
13 the gender of the person who was hired?

14 A. It was -- it was a male.

15 Q. Do you know the age of the person who
16 was hired?

17 A. No, I don't.

18 Q. Okay. And I believe you said you don't
19 know the qualifications of the person who was
20 hired?

21 A. No, I don't.

22 Q. Okay. Then the third position you have
23 listed is flight line. It says: Flight line and
24 quality assurance.

25 Was that a K-level management position?

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1 A. Yes.

2 Q. Okay. And do you know who was selected
3 for that position?

4 A. Yeah. Chris Johnson or Jordan. I
5 can't -- Chris Johnson is what I think his name is,
6 who no longer works there. He was arrested for tax
7 evasion. The other guy, I can't think of his name.
8 And the reason I know the qualifications was -- I
9 mean, I'll think of the other one after we're
10 talking -- but I went to an IA seminar with the
11 other gentleman, and I know what his qualifications
12 were with mine. I had the repair station over him.
13 He didn't have that. He had an A&P and an
14 inspector's license.

15 Q. Okay. You said you went to an IA.
16 What is an IA?

17 A. It's an inspector's authorization. You
18 go to the FAA up in Columbia once a year for
19 renewal on it.

20 Q. Okay. And help me understand -- so are
21 we talking about Chris Johnson or are we talking
22 about the other person?

23 A. The other person. I'll think of his
24 name.

25 Q. So were there -- were there two K-level



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1 management positions on the flight line?

2 A. Yes.

3 Q. And were they both open at the same
4 time?

5 A. Yes.

6 Q. And you applied for -- you just
7 applied, and --

8 A. Right, to get --

9 Q. -- they were filling two spots?

10 A. Correct. And they were both filled by
11 males, early 40s.

12 Q. Okay. And you know the name Chris
13 Johnson?

14 A. Right.

15 Q. And you don't know the name of the
16 other individual?

17 A. I know the other one, I just have to
18 think of it. It will -- just give me a minute when
19 we -- hope to come back to that.

20 So I know Chris, he had an A&P. I
21 don't believe he had an IA. He -- I ran -- did
22 audit for the 121, which was Charleston airport
23 through Boxell, and I know he didn't have that
24 background. And I had the FAA accountable
25 manager's position that he did not have.

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1 Q. Okay. So you believe you were more
2 qualified than he?

3 A. Yeah. He even said so, when I said to
4 him -- because he didn't want the job. It was on
5 third shift at the time. And I said, why did
6 they -- Chris, why did they pick you over me? I --
7 you know, I want third. He said, I don't know why
8 they picked me over you anyway, you're more
9 qualified. And even the other gentleman said,
10 Cindy, you should be out here with us, you've got
11 the background. And I'm like, I know.

12 I wish I could think of his name. Oh,
13 well.

14 Q. Do you know who the hiring manager for
15 that --

16 A. This actually went through Neil Wright.

17 Q. -- for the flight line position? Okay.

18 A. Supposedly, my name was one of 12 that
19 they were going through to decide who the two
20 people would be.

21 Q. So it's your understanding that you
22 made, what I'll call, the short list?

23 A. Yes. I was at least in the running.

24 Q. Okay. Do you know how many people
25 applied for these two flight line positions?

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1 A. They said they had 12 applications. So
2 I don't know if that was the total or -- they said
3 that there's 12 applications and you're one of
4 them.

5 Q. Okay. When you say "they said," who is
6 "they"?

7 A. Senior management. I asked Steve
8 Parrinello.

9 Q. Okay. And so Mr. Parrinello told you
10 that you were one of the 12?

11 A. 12, correct.

12 Q. -- in consideration for the two
13 positions?

14 A. Correct.

15 Q. But you don't know how many people
16 overall may have applied for these positions?

17 A. No, I don't.

18 Q. Do you know the PM scores of any of the
19 these 12 candidates?

20 A. No, I don't.

21 Q. Do you know -- other than what you've
22 just told me, do you have any other information to
23 support your position that you're more qualified
24 than the two people who were hired?

25 A. No. Just my certificates.

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1 Q. Okay. Do you know who made the hiring
2 decision on those other positions?

3 A. No. They were all different.

4 Q. Okay. Do you have any information to
5 support what I understand your allegation to be,
6 that you did not get hired for any of these
7 positions because of your gender?

8 A. Yeah. The flight line one.

9 Q. Okay. So it's your contention that you
10 did not get the flight line position because of
11 your gender?

12 A. Correct.

13 Q. Okay. And on what do you base that?

14 A. Well, whenever I said to Steve, why
15 are -- why did they pick Chris because Chris didn't
16 want to go out there on third shift? Steve
17 Parrinello I'm talking about. He said, just be
18 glad you're not going out there because it would be
19 too much for you. He said, you're in the heat,
20 you're walking around all the time.

21 And I said, you know what? Let me get
22 that position. And if I know I'm not capable of
23 doing it, I'll be the first to say I can't do this
24 job. But you're not giving me the opportunity to
25 do that. And that's when he said there was 12

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1 applicants and you're in the -- you were in the
2 pile. So you know, they picked who they wanted.

3 Q. Okay. What does not wanting the
4 position because of the heat and walking around all
5 the time have to do with your gender?

6 A. I just think -- well, I thought it was
7 age, that that one was age, because he felt that I
8 wasn't physically able to do it. So that's why
9 I -- I always thought it was my age on that, not
10 female. The reason I thought it was female was
11 because they took the two younger men for the
12 position and not me.

13 Q. Okay. So it's not because of anything
14 anybody said. It was just you drew that conclusion
15 because two men were hired for the position?

16 A. The two younger men, yes, were hired.

17 Q. Okay. Well, I'm asking about gender.

18 A. Gender, yes.

19 Q. Okay.

20 A. They picked the two males.

21 Q. And then you interpreted Steve's
22 comment to mean you didn't get the position because
23 of your age?

24 A. Because of age, uh-huh.

25 Q. Okay. How about disability? What does

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1 any disability have to do with not --

2 A. Just -- just what Mike Tidmore said
3 about having the chemo fog or was it my
4 age -- with, you know, not being able to remember.

5 Q. I'm going to reach across here,
6 Ms. Kitchens. You're welcome to see.

7 And I'm going to hand you Exhibit 2.
8 And this -- when I have been asking you about the
9 flight line position that you were talking about, I
10 understood you to be talking about the flight line
11 K-level manager, correct?

12 A. Correct. This was another one. This
13 came out afterwards. The two K-levels were filled
14 first.

15 Q. Okay.

16 A. And I said to my executive leadership
17 coach, maybe it's -- you know, maybe I'm -- I'm too
18 qualified for what they're looking for. So I
19 applied for the L-level position, which is one
20 higher, and didn't get anything for that either.

21 Q. Okay. And --

22 A. And I don't know who was hired for
23 this.

24 Q. Okay. And that's what I was going to
25 ask you. So what we've marked as Exhibit 2 was a



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1 A. Yes.

2 Q. -- hiring decision?

3 A. Yes.

4 Q. Okay. So do you think that a candidate
5 with a higher PM score would be considered more
6 qualified than a candidate with a lower PM score?

7 A. Definitely.

8 Q. Okay. When you were talking earlier in
9 your deposition about conversations with Ron
10 Pentz --

11 A. Uh-huh.

12 Q. -- and you made a comment about being
13 qualified because you're now the director of
14 quality at your current employer --

15 A. Uh-huh.

16 Q. -- what is the name of your current
17 employer?

18 A. Aviation Instrument Technology.

19 Q. Okay.

20 A. Inc.

21 Q. Would you agree with me that the
22 director of quality at Aviation Instrument
23 Technology, Inc. is not the same as the director of
24 quality at Boeing?

25 A. At Boeing? No, they're not the same.

